

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK**

Sungchan Song, Hanna Song, Karen Lucas-Barros, and Aseo Jo,

Plaintiffs,

vs.

Kensington International, Inc., John Gelin, Eyan Edwards, Rhina Hernandez, and The Business Buyers Club, LLC,

Defendants.

Eyan Edwards,

Cross-Claim/Third-Party Plaintiff,

vs.

Kensington International, Inc., John Gelin, Rhina Hernandez, The Business Buyers Club, LLC, and Burke McFarland,

Cross-Claim/Third-Party Defendants.

Case No. 1:21-cv-00543-HG-TAM

JOINT STATUS REPORT

In accordance with the Court's order of August 29, 2022, plaintiffs Sungchan Song, Hanna Song, Karen Lucas-Barros, and Aseo Jo ("Plaintiffs") and defendant Eyan Edwards (together, the "Parties") submit this joint status report on the status of fact discovery.

I. Status of Fact Discovery

Plaintiffs completed the deposition of Mr. Edwards on September 8, 2022.

During and after the deposition, Plaintiffs requested that Mr. Edwards produce the complete email chains for four deposition exhibits. Mr. Edwards has agreed to produce those documents by September 19, 2022. With that supplemental document production, fact discovery will be complete.

The Parties will certify the close of fact discovery by September 23, 2022.

Dated: September 12, 2022

CROWELL LAW FIRM

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Dated: September 12, 2022

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PROOF OF SERVICE

I, the undersigned say:

I am not a party to the above case and am over eighteen years old.

On September 12, 2022, I served true and correct copies of the foregoing document, by posting the document electronically to the ECF website of the United States District Court for the Eastern District of New York, for receipt electronically by the parties listed on the Court's Service List.

I affirm under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed on September 12, 2022, at Los Angeles, California.

s/ Joshua L. Crowell

Joshua L. Crowell